

This responds to your July 6, 2011 letter regarding the June Monthly Report filed by Employees of Northrop Grumman Corporation PAC (ENGPAC) for the period May 1 to May 31, 2011. You inquired about contributions made by ENGPAC to Lewis for Congress Committee and Todd Akin for Congress that, if aggregated with contributions made by Huntington Ingalls Industries Political Action Committee (SHIPPAC), would have exceeded the \$5,000 per election contribution limit. ENGPAC's May 2011 contributions to Lewis for Congress and Todd Akin for Congress should not be aggregated with SHIPPAC's contributions to those committees because ENGPAC and SHIPPAC were no longer affiliated at the time those contributions were made. On March 31, 2011, ENGPAC's connected organization, Northrop Grumman Corporation, completed its spinoff of SHIPPAC's connected organization, Huntington Ingalls Industries, Inc. (formerly Northrop Grumman Shipbuilding). On that date, Huntington Ingalls Industries, Inc. began operating as an independent, publicly traded company. SHIPPAC filed an amended Statement of Organization (FEC Form 1) on March 31, 2011 to remove ENGPAC as an affiliated committee, and ENGPAC also filed an amended Statement of Organization on April 12, 2011.
